

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

| | | |
|--|---|---|
| JAPAN DISPLAY INC., PANASONIC LIQUID CRYSTAL DISPLAY CO., LTD., | § | § C.A. NO. 2:20-cv-00283-JRG § [LEAD CASE] |
| Plaintiffs, | § | § C.A. NO. 2:20-cv-00284-JRG |
| v. | § | § C.A. NO. 2:20-cv-00285-JRG |
| TIANMA MICROELECTRONICS CO. LTD., | § | § [MEMBER CASES] |
| Defendant. | § | § JURY TRIAL DEMANDED |
| | § | |
| | § | |

UNOPPOSED MOTION FOR EXPEDITED BRIEFING

Pursuant to Local Rule CV-7(e), plaintiffs Japan Display, Inc. and Panasonic Liquid Crystal Display Co., Ltd. (“Plaintiffs”) respectfully move the Court for expedited briefing regarding Plaintiffs’ Opposed Motion to Amend the Docket Control Order (“Motion”) filed on September 7, 2021. In the Motion, Plaintiffs seek a short extension to their fact and expert discovery deadlines so that Plaintiffs can receive and analyze outstanding discovery from defendant Tianma Microelectronics Co. Ltd. (“Defendant”) with sufficient time to incorporate such discovery into their opening expert witness reports. An expedited briefing schedule and limited page limits is warranted due to the narrowness of this issue and the short time remaining before the current fact discovery deadline of September 13, 2021. Counsel for Defendant has indicated it is not opposed to expedited briefing on this issue.

Accordingly, Plaintiffs respectfully request the Court grant this Motion for Expedited Briefing and order Defendant to file any response to Plaintiffs’ Opposed Motion to Amend The Docket Control Order on or before September 10, 2021, limited to three pages.

Dated: September 7, 2021

Respectfully submitted,

/s/ Hilary L. Preston

Eric J. Klein
Lead Attorney
Texas State Bar No. 24041258
Jeffrey R. Swigart
Texas Bar No. 24102553
VINSON & ELKINS L.L.P.
2001 Ross Avenue, Suite 3900
Dallas, TX 75201
Telephone: (214) 220-7700
Facsimile: (214) 220-7716
Email: eklein@velaw.com
Email: jswigart@velaw.com

Hilary L. Preston
Texas State Bar No. 24062946
Jeffrey T. Han
Texas State Bar No. 24069870
Erik Shallman
Texas State Bar No. 24113474
VINSON & ELKINS L.L.P.
2801 Via Fortuna, Suite 100
Austin, TX 78746
Telephone: (512) 542-8400
Facsimile: (512) 542-8612
Email: hpreston@velaw.com
Email: jhan@velaw.com
Email: eshallman@velaw.com

Abigail Lubow
California State Bar No. 314396
VINSON & ELKINS L.L.P.
555 Mission Street, Suite 2000
San Francisco, CA 94105
Telephone: (415) 979-6963
Facsimile: (415) 358-5770
Email: alubow@velaw.com

**COUNSEL FOR PLAINTIFFS JAPAN
DISPLAY INC. and PANASONIC LIQUID
CRYSTAL DISPLAY CO., LTD.**

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2021, a true and correct copy of the foregoing document was electronically filed in compliance with Local Rule CV-5(a) and was served on all counsel who are deemed to have consented to electronic service, per Local Rule CV-5(a)(3)..

/s/ Erik Shallman

Erik Shallman

CERTIFICATE OF CONFERENCE

This is to certify that counsel have complied with the meet and confer requirement in Local Rule CV-7(h) and that this motion is opposed. The personal conference required by the Rule was conducted by email on September 7, 2021 between counsel for Plaintiffs (Hilary Preston) and counsel for Defendant (James Barney, Eric Findlay, and Aidan Skoyles), and Defendant indicated it does not oppose this motion.

/s/ Hilary L. Preston

Hilary L. Preston